

**Tannenbaum Helpern
Syracuse & Hirschtritt LLP**

Joseph D. Lockinger
(212) 508-6714
lockinger@thsh.com

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 5/17/18
--

900 Third Avenue New York, NY 10022-4775
Tel: (212) 508-6700 | Fax: (212) 371-1084
www.thsh.com | @THSHLAW

MEMO ENDORSED

May 16, 2018

VIA ECF

Hon. Colleen McMahon
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007

Conference cancelled.

Colleen McMahon
5/17/18

Re: *Fischler v. Num Pang Holdings LLC, et al.*
No. 18 Civ: 1683 (CM)

Dear Judge McMahon:

In accordance with the Court's Order dated March 2, 2018 (ECF No. 10), the parties submit the attached "Civil Case Management Plan" in advance of the initial conference scheduled for May 18, 2018, at 10:30 a.m. before your Honor. The parties request that the court accept the attached Civil Case Management Plan and cancel the currently scheduled initial conference.

The currently selected deadline for discovery, to include all expert discovery and reports, is October 26, 2018. The selected deadline for motions to amend the pleadings or to join additional parties is June 15, 2018. The selected deadline for the parties' initial disclosures is June 1, 2018. Finally, based on the selected deadlines, the parties will be required to submit the joint pre-trial order, in the form prescribed in your Honor's individual rules, together with all other pre-trial submissions, on or before December 10, 2018.

The parties recognize that the current deadline for discovery falls approximately seven weeks beyond the six month deadline set by the Court in the dated March 2nd Order. However, the parties request this additional time to complete discovery in order to accommodate for the following: (1) Defendants retained new counsel for this matter on April 6, 2018 (ECF No. 16); and (2) Plaintiff's counsel is currently expecting a child on or



Fischler v. Num Pang Holdings LLC, et al.,
18 Civ. 1683 (CM)
May 16, 2018
Page 2

about June 23, 2018. Based on the above, the parties request that the Court allow the parties to select October 26, 2018, as the fact discovery deadline for this case.

Thank you for Your Honor's consideration of this request and your time and attention to this matter.

Respectfully Submitted,



Joseph D. Lockinger

cc: Lipsky Lowe LLP (via e-mail chris@lipskylowe.com; doug@lipskylowe.com)

Enclosure